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UNITED STATE DISTRICT COURT
DISTRICT OF NEVADA

BOARD OF TRUSTEES OF THE
EMPLOYEE PAINTERS' TRUST; BOARD
OF TRUSTEES OF THE DISTRICT
COUNCIL 16 NORTHERN CALIFORNIA
JOURNEYMAN AND APPRENTICE
TRAINING TRUST FUND; BOARD OF
TRUSTEES OF THE INTERNATIONAL
PAINTERS AND ALLIED TRADES
INDUSTRY PENSION FUND; BOARD OF
TRUSTEES OF THE PAINTERS AND
ALLIED TRADES LABOR
MANAGEMENT COOPERATION
INITIATIVE; BOARD OF TRUSTEES OF
THE FINISHING TRADES INSTITUTE;
POLITICAL ACTION TOGETHER-
POLITICAL COMMITTEE FUND; STAR
PROGRAM, INC.; HOLIDAY AND
VACATION FUND,
Plaintiffs,

vs.

QUALITY SERVICES, INC. d/b/a QUALITY
CARPETS, a Nevada corporation; BARRY
ALLEN GRIDER, an individual; PATRICK
W. GRIDER, an individual; KATHRYN
LOUISE GRIDER, an individual; ARCH
INSURANCE COMPANY, a Missouri
corporation; HARTFORD FIRE
INSURANCE COMPANY, a Connecticut
corporation; DOES I-X; ROES I- X,
Defendants.

CASE NO.: 2:24-cv-00280-APG-MDC

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINE TO
RESPOND TO PLAINTIFFS' MOTION
FOR LEAVE TO FILE FIRST
AMENDED COMPLAINT
[FIRST REQUEST]**

Plaintiffs, Board of Trustees of The Employee Painters' Trust, *et al.* (collectively the
"Plaintiffs"), and the remaining Defendants Quality Services, Inc. d/b/a Quality Carpets, Barry

1 Allen Grider, Patrick W. Grider and Kathryn Louise Grider (collectively, the “Defendants”)¹, each
2 acting by and through their undersigned counsel, respectfully file this Stipulation to Extend the
3 Deadline to Respond to Plaintiffs’ Motion for Leave to File First Amended Complaint for the
4 reasons set forth more fully below.

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6 On March 28, 2025, Plaintiffs filed Plaintiffs’ Motion for Leave to File First Amended
7 Complaint (ECF No. 22) (“Motion”). In their Motion, Plaintiffs acknowledge that their claims are
8 automatically stayed as to Defendant Quality Services, Inc. d/b/a Quality Carpets, only, due to its
9 filing for Bankruptcy and pursuant to 11 U.S.C. § 362.² However, Plaintiffs stated an intention to
10 proceed with their claims against the individual defendants: Barry Allen Grider, his wife, Kathryn
11 Louise Grider, and their son, Patrick W. Grider, who are all officers of Quality Carpets.

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13 Defense counsel was recently informed that Defendant Kathryn Louise Grider was
14 admitted to a hospice program last week. As a result, defense counsel has been unable to
15 adequately consult with the individual defendants regarding Plaintiffs’ Motion and a response
16 thereto, which is currently due on or before April 11, 2025. In light of such circumstances, the
17 Parties stipulate that the deadline for Defendants to file a response to Plaintiffs’ Motion be
18 extended by a period of fourteen (14) days, from April 11, 2025, to April 25, 2025.

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26 ¹ On March 28, 2025, Plaintiffs filed a Notice of Voluntary Dismissal of Arch Insurance Company with Prejudice (ECF No. 20) and a Notice of Voluntary Dismissal of Hartford Fire Insurance Company without Prejudice (ECF No. 21).

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28 ² On November 12, 2024, Defendants filed a Notice of Filing of Voluntary Petition for Bankruptcy and Application of Automatic Stay of Proceedings (ECF No. 19) regarding Quality Carpets’ Bankruptcy Petition.

1 The Parties represent that the reasons described above constitute good cause to extend the
2 deadline to respond to Plaintiffs' Motion and maintain that this request is made in good faith and
3 not for purposes of delay.
4

5 DATED this 11th day of April 2025.

6 CHRISTENSEN JAMES & MARTIN

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*Counsel for Defendants Quality Services, Inc.,
Barry Allen Grider, Patrick W. Grider, and
Kathryn Louise Grider*

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15 IT IS SO ORDERED:
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20 Hon. Maximiliano D. Couvillier III
21 United States Magistrate Judge
22 DATED: 4/14/2025
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